

**Before the
Federal Communications Commission
Washington, D.C. 20554**

| | | |
|--|---|----------------------|
| In the Matter of |) | |
| |) | |
| Lifeline and Link Up Reform and |) | WC Docket No. 11-42 |
| Modernization |) | |
| |) | |
| Federal-State Joint Board on Universal Service |) | CC Docket No. 96-45 |
| |) | |
| Advancing Broadband Availability Through |) | WC Docket No. 12-23 |
| Digital Literacy Training |) | |
| |) | |
| Lifeline and Link Up |) | WC Docket No. 03-109 |

**REPLY COMMENTS OF THE PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

Pursuant to the Further Notice of Proposed Rulemaking released in the above-cited dockets on February 6, 2012 (FNPRM)¹ the Public Service Commission of the District of Columbia (DC PSC) respectfully files limited reply comments in response to several issues raised in the FNPRM. The DC PSC supports the development of a national eligibility database, use of federal Lifeline service funds to support digital literacy training, and a requirement that eligible telecommunications carriers (ETCs) offer at least one bundled Lifeline service offering in addition to basic voice service Lifeline offerings. The DC PSC urges the Federal Communications Commission (FCC) to not permit incumbent local exchange carrier (ILEC) ETCs to withdraw from providing Lifeline service, since there is only one ILEC ETC in the District of Columbia that provides wireline Lifeline service.

THE FCC SHOULD SUPPORT THE CREATION OF A NATIONAL ELIGIBILITY DATABASE

The DC PSC agrees with the numerous commenters that the creation of a national eligibility database would simplify the administration of the Lifeline service program, since eligible telecommunications carriers (ETC), state commissions, and other interested parties would have only one

¹ Public Notice, *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding, Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, rel. March 6, 2012..

database to search to determine if a customer is eligible for Lifeline service.² While much of the information to be included in the database is sensitive personal information, the DC PSC notes that several states have resolved privacy issues by either limiting the amount of information to be provided by the customer or by limiting the amount of information that an ETC receives in response to an eligibility query.³ The national eligibility database should be able to provide a “yes/no” response to an ETC query about eligibility without revealing additional sensitive information to the ETC about a customer.⁴

The DC PSC recognizes that the creation of a national database will entail costs. The DC PSC cautions that states do not have the funds to pay for any interfaces necessary between a national database and the state databases. The DC PSC recommends establishing a flat fee structure for ETCs to use the national eligibility database.

LIFELINE FUNDS SHOULD BE MADE AVAILABLE FOR DIGITAL LITERACY TRAINING.

As noted in its Comments, the DC PSC supports the use of federal Lifeline service funds for digital literacy training, since that training should stimulate broadband adoption rates by educating low-income consumers about the benefits of broadband access. Even if low-income customers subscribe to Lifeline broadband services, without digital literacy training the broadband services may be underutilized. Together with support for broadband connections and broadband equipment, support for digital literacy training should assist in bridging the digital divide.

While the DC PSC believes that schools and libraries may be the most effective venues to begin digital literacy initiatives, the DC PSC agrees with commenters that have suggested a wide range of other

² See, Comments of Alaska Communications Systems Group, Inc. at 2-3, filed April 2, 2012; Comments of CenturyLink at 2, filed April 2, 2012; Comments of Cox Communications, Inc. at 5-7, filed April 2, 2012; Comments of the Florida Public Service Commission at 5-6, filed April 2, 2012; Comments of the Independent Telephone & Telecommunications Alliance at 4, filed April 2, 2012; Comments of TracFone Wireless, Inc. on Further Notice of Proposed Rulemaking at 4, filed April 2, 2012; Comments of the US Telecom Association at 2, filed April 2, 2012.

³ In Florida, ETCs are required to provide name, date of birth, and last four digits of the social security number. Florida PSC Comments at 4.

⁴ TracFone indicates that the State of Washington provides a “yes/no” response to an ETC query about participation in one of the qualifying programs. TracFone Comments at 4-5.

venues in which digital literacy training can be successful. For example, the National Association of Telecommunications Officers and Advisors and the National Association of Counties suggests that community centers such as senior centers, low-income housing centers, and shelters could be used to maximize the outreach to consumers that have not previously had access to digital literacy training.⁵ Funding for digital literacy training should be available for both formal classroom instruction as well as informal training conducted by computer center staff in response to a particular query by a consumer.⁶

The DC PSC recognizes that there is a great need for digital literacy, which probably exceeds any available funding. The DC PSC suggests that the FCC should establish pilot programs for digital literacy, like the FCC is now doing for Lifeline broadband connectivity. Pilot programs may assist in identifying best practices in digital literacy training, leading to more efficient use of digital literacy Lifeline funding.

ETCS SHOULD BE REQUIRED TO OFFER BUNDLED LIFELINE SERVICE AS ONE LIFELINE SERVICE OPTION.

In its Comments, the DC PSC noted its support for a requirement that ETCs offer bundled Lifeline service options as well as discrete Lifeline voice service options to their customers. Cox Communications, i-wireless, TracFone, US Telecom Association, and Verizon oppose the adoption of any requirement to offer Lifeline bundled service or permit the application of the Lifeline service discount to any bundle they offer, arguing that there is no need for these requirements because competitive pressure will encourage the offering of bundled Lifeline service options.⁷ However, as the DC PSC pointed out, the only wireline ETC in the District of Columbia, Verizon Washington, DC Inc. (Verizon DC), has indicated that it does not wish to offer bundled Lifeline service options, depriving District of Columbia consumers of wireline bundled Lifeline service options. Contrary to Verizon's arguments,

⁵ Comments of the National Association of Telecommunications Officer and Advisors and the National Association of Counties at 3-5, filed April 2, 2012.

⁶ See, Comments of Connected Nation, Inc. at 14, filed April 2, 2012.

⁷ Cox Comments at 15; i-wireless Comments at 8, filed April 2, 2012; US Telecom Association Comments at 7; Comments of TracFone at 16; Comments of Verizon at 8, filed April 2, 2012.

there is no competitive pressure on Verizon DC to expand its wireline Lifeline options. The DC PSC seeks to promote a wide variety of Lifeline service options, and a requirement to offer a bundled Lifeline service option that includes a voice service (in addition to traditional voice Lifeline service options) would promote the availability of a wider range of wireline Lifeline options to District of Columbia residents.

ILECS SHOULD STILL BE REQUIRED TO OFFER WIRELINE LIFELINE SERVICE.

As the DC PSC noted in its Comments, there is only one wireline Lifeline ETC in the District of Columbia, the ILEC, Verizon DC. If Verizon DC were to withdraw from the Lifeline market, District of Columbia consumers would have no wireline options for Lifeline service. Contrary to the claims made by many telecommunications service providers, wireless service is still no substitute for wireline service for many Lifeline service customers, particularly the elderly and disabled and low-income residents of multi-tenant buildings with inconsistent wireless service coverage. The DC PSC joins the California Public Utilities Commission⁸ in urging the FCC to reject AT&T's proposal⁹ and other requests to permit ILECs to withdraw their wireline Lifeline service offerings, particularly in jurisdictions where no other wireline Lifeline provider exists.¹⁰ Alternatively, the DC PSC supports the Tennessee Regulatory Authority's (TRA) recommendation that state commissions should be permitted to determine whether a wireline ILEC can cease providing wireline Lifeline service.¹¹ In that way, the DC PSC can protect its wireline Lifeline service customers from losing their Lifeline service.

⁸ Comments of the California Public Utilities Commission and the People of the State of California in Response to Further Notice of Proposed Rulemaking in Lifeline/Link Up Reform Proceeding at 8-9, filed April 2, 2012.

⁹ *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up*, WC Docket Nos. 11-42, 03-109, AT&T *ex parte*, filed January 24, 2012,

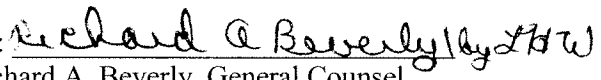
¹⁰ Comments of the Joint Commenters at 13; Comments of TracFone at 22; US Telecom Association Comments at 8; Verizon Comments at 10-11.

¹¹ Comments of the Tennessee Regulatory Authority at 2-3, filed April 2, 2012.

The DCPSC appreciates the opportunity to submit reply comments in this proceeding.

Respectfully submitted,

**PUBLIC SERVICE COMMISSION
of the DISTRICT OF COLUMBIA**

By: 
Richard A. Beverly, General Counsel
Lara Howley Walt

1333 H Street, N.W.
Suite 200, West Tower
Washington, D.C. 20005
202-626-5100

Its Attorneys

May 1, 2012